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March 31, 2006

VIA FACSIMILE @ 724 / 652-8380  
Dallas W. Hartman, Esquire  
Dallas W. Hartman P.C.  
2815 Wilmington Road  
New Castle, PA 16105

Re: Tina Lindquist v. Heim, L.P.  
Case No: 04-249E  
D/A: 9/25/02  
Our File: ALFA-107530

Dear Mr. Hartman:

I received your letter dated March 28, 2006 and your accompanying request that we provide you with "all transcripts, reports and materials that you will be using to cross-examine" your expert witness. You and I have already discussed this issue and therefore your placing the request is writing has again raised a concern. Nonetheless, you have no right to request such documents even if I knew which documents I intended to use.

I respectfully suggest that you reconsider this request, as it, like your assertion that you do not need to provide us with your experts' files, has no basis in law.

Please also allow this to confirm what we actually discussed by way of the depositions. I asked that Professor Barnett be produced on April 6, 2006 at 9:00 a.m., and you advised that he would only be available at 11:00 a.m. I indicated that we likely would need to continue his deposition on April 7<sup>th</sup>, but you advised that Professor Barnett would stay for the required seven (7) hours of examination.

We next discussed William Switalski providing his deposition on April 7, 2006. His deposition will begin at 8:00 a.m. considering both of us will be in Chicago during the evening of the April 6<sup>th</sup>. The deposition of Gary Hutter will commence immediately after Mr. Switalski's deposition and you advised you would make every effort to complete both depositions on April 7<sup>th</sup>.

The deposition of Dennis Cloutier will be taken on April 11, 2006 in Cincinnati, Ohio. I have arranged for that deposition to be taken at the offices of Dinsmore & Shohl, 255 E. 5<sup>th</sup> Street, Suite 1900, Cincinnati, OH 45202 at 10:00 a.m.

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To the extent you do not complete Dr. Hutter's deposition on April 7, 2006, Dr. Hutter will be available for the completion of that deposition on April 12, 2006 in Chicago.

The self-serving comment regarding Dr. Hood's deposition is inaccurate and in violation of the court's order for you to produce all experts for their depositions prior to April 16, 2006. It appears I should have placed our initial request for his deposition in writing but, nonetheless, the court already has ordered the plaintiff to produce her experts for depositions prior to April 16, 2006.

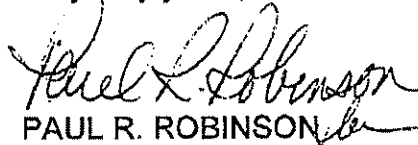
You have yet to request the deposition of Mr. David Zak, and I ask that you immediately advise if you intend to take his deposition and provide me with dates on which you are available. Considering the court's order, I will make myself available, and make certain that Mr. Zak is available, prior to April 16, 2006.

With regard to Mr. Ulmenstine, I advised that upon receipt of your letter advising that Mr. Ulmenstine will not be offering any opinions relative to this case and your confirming as you represented to me that Mr. Ulmenstine's only involvement pertained to his conducting the foot control experiment, I advised I would consider the need for his deposition. Your letter does not reference Mr. Ulmenstine's involvement only being with regard to the foot control experiment. I never agreed to not depose him and only advise that I would consider the issue and talk with my client following receipt of your letter. Having received your letter, I would like to depose Mr. Ulmenstine and request that his deposition be taken on April 6, 2006 at 9:00 a.m., which will give us two (2) hours to determine his involvement and then decide if we need to continue his deposition at some later date.

I have enclosed amended notices of depositions for Matthew Ulmenstine and Ralph Barnett based upon our actual conversation. Please contact me if you would like to discuss these issues further.

Thank you.

Very truly yours,

  
PAUL R. ROBINSON

PRR/pla  
Enclosure